

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF POSTAL SERVICE WITNESS BRADLEY  
TO UPS INTERROGATORIES  
(UPS/USPS-T16-1)

The United States Postal Service hereby provides the response of Postal Service witness Bradley to the following interrogatories of United Parcel Service: UPS/USPS-T16-1, filed on November 1, 2001. Interrogatories 2 and 3 were redirected to the Postal Service. An objection was filed to interrogatory 4.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Richard T. Cooper

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November 16, 2001

Response of United States Postal Service Witness Bradley  
to  
Interrogatories of UPS

UPS/USPS-T16-1. Refer to page 5 of your testimony, USPS-T-16, where you state that the Commission's rejection of the Engineered Standards study in Docket No. R2000-1 "likely reflects the unique circumstances in that case . . ." Explain in detail what the "unique circumstances in that case" were.

UPS/USPS-T16-1 Response:

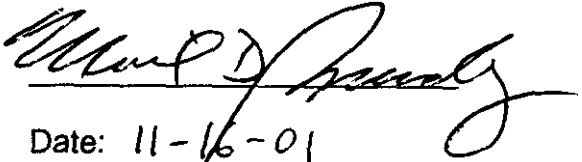
The entire sentence from which the quote was taken reads:

It is true that the Commission rejected the timely Engineering Study (ES) data in Docket No. R2000-1 in favor of vintage data, but that most likely reflects the unique circumstances in that case and not a change in approach.

The "unique circumstances" I was referring to was simply the record evidence before the Commission in that specific case.

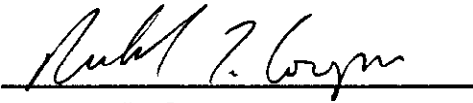
## DECLARATION

I, Michael D. Bradley, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

  
Date: 11-16-01

### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, appearing to read "Richard T. Cooper", is written over a horizontal line.

Richard T. Cooper

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